

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

JILL BABCOCK, et al.

Plaintiffs,

Case No. 22-cv-12951-JJCG-APP

v

Hon. Jonathan J.C. Grey
Mag. Anthony P. Patti

STATE OF MICHIGAN, et al.

Defendants.

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**DEFENDANT DETROIT-WAYNE JOINT BUILDING AUTHORITY'S
INITIAL WITNESS LIST**

Defendant Detroit-Wayne Joint Building Authority (“DWJBA”) provides the following initial witness list identifying persons DWJBA currently anticipates that it will or may call testify at trial:

1. Plaintiff Jill Babcock
2. Plaintiff Marguerite Maddox
3. Current and former employees of DWJBA and current and former commissioners of DWJBA, including (without limitation) current chairperson Sharon Madison, c/o counsel.
4. Gregory (“Gregg”) McDuffee, the immediate past Executive Director of DWJBA, c/o counsel.
5. Current and former employees of Hines Detroit Services LLC, including (without limitation) John Rizzo, c/o counsel.
6. Michael Kennedy, the current acting Executive Director of DWJBA and employee of Hines, c/o counsel.

7. Christopher Hewitt, the current engineering manager at CAYMC and employee of Hines, c/o counsel.
8. James Harris, the director of security at CAYMC, c/o counsel.
9. Representatives of DLZ Michigan, Inc., 607 Shelby St., Ste. 650, Detroit, MI 48226, (313) 961-4040.
10. Stephen Metzger of DLZ Michigan, Inc., c/o counsel.
11. Representatives of Hamilton Anderson Associates, Inc., 1435 Randolph, Suite 200, Detroit, Michigan 48226, (313) 964-0270.
12. Representatives of builders and architects who have worked with DWJBA.
13. Representatives of NORR, including (without limitation) Scott Catallo, 150 W. Jefferson Ave., Suite 1300, Detroit, Michigan 48226, (313) 324-3100.
14. Representatives of SmithGroup JJR, including (without limitation) A.J. Noto, 500 Griswold St., Suite 1700, Detroit, Michigan 48226, (313) 983-3600.
15. Representatives of Gilbane Building Company, including (without limitation) Matt Lamrouex, 500 Woodward, Suite 2250, Detroit, Michigan 48226, (313) 202-0242.
16. Representatives of the City of Detroit, including (without limitation) Christopher Samp, c/o the City's counsel.
17. Representatives of the County of Wayne, c/o the County's counsel.
18. Representatives of the Wayne County Circuit Court, including (without limitation) Eric Weems and Amanda Cunningham, c/o the County's counsel.
19. Representatives of the Wayne County Probate Court, including (without limitation) Kim Zawora and April Maycock, c/o the County's counsel.
20. Persons involved with the "CAYMC ad hoc Committee," including (without limitation) Michael Bartnik, Ashley Jacobson, Christopher

Samp, Warren Evans, Gregg McDuffee, Alisha Bell, Michael Duggan, Brenda Jones, Hon. Timothy Kenny, and Hon. Freddie Burton, Jr.

21. Representatives of Elder Law and Disability Rights Section of the State Bar of Michigan, including (without limitation) Christine Caswell, Nadia Vann, Michael Bartnik, Kelly Quardokus, Christopher Smith, and Shannon DeWall.
22. Representatives of Riverfront Holdings, Inc., 300 Renaissance Center, Detroit, Michigan 48265, or other substitute party to the Skywalk Agreement.
23. Any person identified in Plaintiffs' Initial Disclosure or each Co-Defendant's Initial Disclosure and any subsequent amendment thereto.
24. Any person identified on the Initial Witness List of Plaintiffs or any Co-Defendant.
25. Any person needed to introduce any exhibit identified and produced in discovery or as needed for rebuttal or impeachment, including (without limitation) related to damages or other relief sought by Plaintiffs.
26. DWJBA contemplates the use of expert witnesses, yet to be identified.

Discovery is still ongoing. DWJBA reserves the right to identify additional witnesses based on that discovery. DWJBA also reserves the right to amend this list based on the Court's ruling on pending motions and anticipated motions *in limine*. DWJBA further reserves the right to amend this list based on any exhibits or other matters disclosed before the parties file the final pretrial order and as permitted by the Federal Rules of Civil Procedure and/or any law or rule.

Respectfully submitted,

CLARK HILL PLC

Dated: January 10, 2025

By: /s/ Paul S. Magy
Paul S. Magy (P34423)
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LOCAL RULE CERTIFICATION

I, Paul S. Magy, certify that this document complies with Local Rule 5.1(a), including: double-spaced (except for quoted materials and footnotes); at least one-inch margins on the top, sides, and bottom; consecutive page numbering; and type size of all text and footnotes that is no smaller than 10-1/2 characters per inch (for non-proportional fonts) or 14 point (for proportional fonts). I also certify that it is the appropriate length. Local Rule 7.1(d)(3).

/s/ Paul S. Magy

CERTIFICATE OF SERVICE

Paul S. Magy, being first duly sworn, deposes and states that on this 10th day of January, 2025, he caused to be served a copy of the foregoing pleading upon all counsel of record via email.

/s/ Paul S. Magy